

SUNDERWOOD LAW FIRM, P.C.
Thomas C. Riney, SBN: 16935100
W. Heath Hendricks, SBN: 24055651
500 South Taylor, Suite 1200, LB 233
Amarillo, Texas 79101
Telephone: (806) 376-5613
Facsimile: (806) 379-0316
Email: tom.riney@uwlaw.com
Email: heath.hendricks@uwlaw.com

-and-

Michael R. Johnson (*Pro Hae Vice*)
RAY QUINNEY & NEBEKER P.C.
36 South State Street, Suite 1400
Salt Lake City, Utah 84111
Telephone: (801) 532-1500
Facsimile: (801) 532-7543
Email: mjohnson@rgn.com

Attorneys for Plaintiff Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>INRE:</p> <p>McCLAIN FEED YARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,</p> <p>Debtors.¹</p>	<p>Chapter 7</p> <p>CASE NO. 23-20084-rlj</p> <p>Jointly Administered</p>
<p>RABO AGRIFINANCE LLC,</p> <p><i>Plaintiff</i></p> <p>v.</p>	<p>ADV. PROC. NO. 23-02005-rlj</p> <p>Honorable Robert L. Jones</p>

¹ The Debtors in these jointly administered cases are: (1) McClain Feed Yard, Inc. (Case No. 23-20084); (2) McClain Farms, Inc. (Case No. 23-20885); and (3) 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

ACEY LIVESTOCK, LLC; MICHAEL ACEY; STAN E. AYERS, JR.; ARNOLD BRAUN TRUST; ARNOLD BRAUN; ROBERT BRAUN; BARD RANCH LAND & CATTLE LLC; N. TERRY DICKS; BARRETT'S LIVESTOCK INC.; DON RALPH BARRETT; BELLA ELEGANCE LLC; BIG SEVEN CAPITAL PARTNERS, LLC; DORA BLACKMAN; BRYAN BLACKMAN; EDDIE BRYANT; BRENT BURNETT; JOE BURNETT; TERRY BURNETT; BUSS FAMILY TRUST; EDWIN D. BUSS; DENNIS BUSS; C HEART RANCH, LLC; COLETTE LESH; CARRAWAY CATTLE, LLC; RICHARD CARRAWAY; CURTIS JONES FARMS; DAC83 LLC; ERIC DeJARNATT; DON JONES FARM, INC.; DON JONES TRUCKING, INC.; DUFURRENA CUTTING HORSES; EDWARD LEWIS DUFURRENA; RIETA MAY DUFURRENA; ROBERT ELLIS; MICHAEL EVANS; DOUG FINLEY; GARWOOD CATTLE CO.; JUSTIN GARWOOD; GENE BROOKSHIRE FAMILY, LP; JOEL BROOKSHIRE; GRAY BROTHERS CATTLE; ROBERT GRAY; RONNIE GRAY; JIMMY GREER; GUNGOLL CATTLE, LLC; BRADLEY GUNGOLL; LEAH GUNGOLL; JACE HARROLD; HINES CATTLE COMPANY, LLC; HINES FARMS, LLC; A.J. JACQUES LIIVING TRUST; CORY JESKO; DWIGHT JESKO, JOANN & KEITH BROOKS d/b/a BROOKS FARMS; LARRY KEITH; DUSTIN JOHNSON; DAVID JOHNSON; KINSEY JONES; KINGDOM TRUST; JAMES MCCUAN; KEITH HARRIS; JANICE LAWHON; JAN LESH; MORRISON CAFE, LLC; LESH FAMILY TRUST; GARY LESH; JARED LESH; JORDAN LESH, LLC; LFC CATTLE; CHARLES LOCKWOOD; COLE LOCKWOOD; SHERLE LOCKWOOD; NIKKI LOCKWOOD; MAP ENTERPRISES; MIKE GOURLEY;

NATALIE MARTUS; JEAN NIX; OPEN A ARENA LLC; BARRY PHILLIPS; DREW PHILLIPS; PRIEST CATTLE COMPANY LTD; PRIEST VICTORY INVESTMENT LLC; CHRISTOPHER PRINCE; PRODUCERS LIVESTOCK COMMISSION; SONNY BARTHOLD; DAVID RAINEY; RAPP RANCH; MARK J. REISZ; RALPH REISZ; RIDGEFIELD CAPITAL ASSET MANAGEMENT; JIM GIORDANO; RILEY LIVESTOCK, INC.; ANGIE ROBINSON; RICK RODGERS; STEVE RYAN; JIM RININGER; SCARLET & BLACK CATTLE, LLC; COLTON LONG; SCOTT LIVESTOCK COMPANY; SHAW & SHAW FARMS PARTNERSHIP LLC; THE UNIVERSITY OF FLORIDA; ROBERT J. SPRING; STARNES CATTLE; JEFF STARNES; EDDIE STEWART; ROBERT STEWART; RACHEL STEWART; SCOTT E. STEWART; STEVE T SCOTT FARMS, INC.; JUSTIN STUEVER; PHILLIP SULLIVAN; AMY SUTTON; CRAIG SUTTON; TGF RANCH LLC; TOM FRITH; THORLAKSON DIAMOND T FEEDERS, L.P.; JOHN TIDWELL; MYKEL TIDWELL; TINDAL TRUCK SALES; JOHN TINDAL; JANET VANBUSKIRK; LYNDAL VANBUSKIRK; SUSAN VAN BUSKIRK; COLBY VANBUSKIRK; CAMERON WEDDINGTON; NANCY WEDDINGTON; WILLIAM WEDDINGTON; WILDFOREST CATTLE COMPANY LLC; WILEY ROBY RUSSELL, JR. as TRUSTEE OF THE W. ROBBIE RUSSELL LIVING TRUST; WJ PERFORMANCE HORSES, INC.; JOB WHITE; and KENT RIES, in his capacity as CHAPTER 7 TRUSTEE OF THE DEBTORS' CONSOLIDATED BANKRUPTCY ESTATE.

Defendants.

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO FIRST AMENDED COMPLAINT

On January 25, 2024, counsel for the Defendants listed on Exhibit A attached hereto, who may have been named in the above-entitled adversary proceeding ("Named Defendants"), accepted service of the Amended Adversary Complaint that is on file in this matter [Dkt. 3], a copy of which has been provided to counsel, on behalf of the Named Defendants. The Named Defendants waived the right to service of the Amended Adversary Complaint by personal service or other means as may be permitted or required by Rule 4 of the Federal Rules of Civil Procedure or Rule 7004 of the Federal Rules of Bankruptcy Procedure, and agreed to serve an answer or other appropriate response to the Complaint by no later than February 20, 2024, or such later date as the parties may agree upon or the Court may direct.

Counsel for Plaintiff in the above-entitled adversary proceeding, Michael R. Johnson, has agreed to extend the deadline for the Named Defendants listed on Exhibit A who may have been named as a defendant in the above-entitled adversary proceedings, to March 5, 2024.

The Named Defendants waive no other requirements of the Federal Rules of Civil Procedure or the Federal Rules of Bankruptcy Procedure or any other right, including but not limited to their right to contest subject matter or personal jurisdiction, and specifically reserve the right to assert all available defenses in this action other than defenses based upon improper service of process.

DATED: February 19, 2024

AGREED:

By: <u>s/Abel A. Leal</u> Abel A. Leal Of Counsel State Bar No. 24026989 abel@ssbtxlaw.com Tel. (214) 395-5325 8144 Walnut Hill Lane Suite 800 Dallas, Texas 75231 Simmons Smith Brown, PLLC Counsel for Defendants in Exhibit "1"	By: <u>s/Michael r. Johnson (Pro Hac Vice)</u> RAY QUINNEY & NEBEKER, P.C. 36 South State Street, Suite 1400 Salt Lake City, Utah 8411 Telephone (801)532-1500 Facsimile: (801) 532-7543 Email: mjohnson@rgn.com Attorneys for Rabo AgriFinance LLC
---	--

1656216

EXHIBIT A

First Name	Last Name	Entity Name	City	State	Zip
Dennis	Buss		Tonkawa	OK	74653
Ed	Busss	Buss Family Trust	Shawnee	OK	74084
Eddie	Bryant		Prosper	TX	75078
Robert E.	Gray		Ralston	OK	74650
Ronnie	Gray		Ralston	OK	74650
Robert E. & Ronnie	Gray	Gray Brothers	Ralston	OK	74650
Craig & Amy	Sutton		Allen	TX	75002
Steve	Ryan		Yukon	OK	73099
Janice E.	Lawhon		Blackwell	OK	74631-4309
AJ	Jacques	AJ Jacques Living Trust	Stillwater	OK	74074
Bradley	Gungoll	Gungoll Cattle Co., LLC	Stillwater	OK	74074
Leah	Gungoll	c/o Bradley Gungoll	Stillwater	OK	74074
Jan	Lesh	Morrison Café, LLC	Perry	OK	73077
Jan	Lesh	Lesh Family Trust	Perry	OK	73077
Jan & Gary	Lesh		Perry	OK	73077
Jordan	Lesh	Jordan Lesh, LLC	Perry	OK	73077
Jared	Lesh		Whitesboro	TX	76273
Joel	Brookshire		Crosby	TX	77532
Joel	Brookshire	Gene Brookshire Family, LP	Lufkin	TX	75901
Bryan	Blackman		Healdton	OK	73438
Douglass	Finley		Tulsa	OK	74135
Colton	Long	Scarlet and Black Cattle, LLC	Amarillo	TX	79119
Steve	Scott	Steve T Scott Farm Inc.	West Point	MS	39773
Steve	Scott	Scott Livestock Company Inc.	West Point	MS	39773
Dr. Arnold	Braun	Arnold Braun Trust	Grandview	IN	47615
Robert	Braun		Evanston	IN	47531
Jim	Rininger		Rockport	IN	47635
Robert	Spring		Edmond	OK	73083
Michael & Miranda	Evans		Clinton	KY	42031
Charles	Lockwood		Ringling	OK	73456
Cole	Lockwood		Ringling	OK	73456
Sherle	Lockwood		Ringling	OK	73456
Nikki	Lockwood		Ringling	OK	73456
Lyndal	Van Buskirk		Ringling	OK	73456
Janet	Van Buskirk		Ringling	OK	73456
Colby & Susan	Van Buskirk		Ringling	OK	73456
Jimmy	Greer		Murray	KY	42071
Dustin	Johnson		McCool	MS	39108
Dora	Blackman		Orlando	OK	73073